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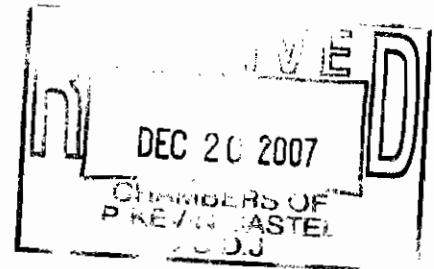
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By Hand
MEMO ENDORSED

December 19, 2007

Hon. P. Kevin Castel
United States District Judge, SDNY
Daniel Patrick Moynihan Courthouse
500 Pearl St., Room 2260
New York, NY 10007

Re: United States v. Stephen Lawrence, 07-cr-00597

Dear Judge Castel:

With the consent of the Government and Pretrial Services, we submit this application to modify two conditions this Court set for Mr. Lawrence's bail.

Mr. Lawrence is currently free on \$5 million bond. His bail requires him to report to Pretrial Services in the United States in person once a month. His bail permits him, on notice to the Government, to travel to Canada and the Bahamas.

With the Government's consent, Mr. Lawrence is currently residing outside the United States. Mr. Lawrence has complied with all conditions of his bond and is not a flight risk.

We ask for the following modifications: (1) We request that the Court reduce the frequency of Mr. Lawrence's in-person reporting to Pretrial Services to once every three months. (2) We request that the travel restrictions be expanded to permit Mr. Lawrence to travel to Europe, again on notice to the Government.

We seek the reduced in-person reporting schedule because traveling to the United States on a monthly basis is inconvenient and costly for Mr. Lawrence, and – given his track record on bail – is not necessary to assure his appearance in Court. On December 7, 2007 the Court granted a similar modification to Mr. Lawrence's co-defendant, John Lefebvre.

We seek the expanded travel restrictions because Mr. Lawrence wishes to travel for both business and personal reasons to Europe in January and February of 2008.

Bail modified - person reports such that in-person reporting is required once every three months and, upon prior written notice to the government, may travel to countries within the European Union.

ORDERED
USDS
12-20-07

Wilmer Cutler Pickering Hale and Dorr LLP, 399 Park Avenue, New York, New York 10022

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I have spoken to Assistant United States Attorney Benjamin Gruenstein, and Pretrial Services officer Dennis Khilkevich, and both have consented to the request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. Neiman', with a long horizontal flourish extending to the right.

Peter G. Neiman

cc: Benjamin Gruenstein, Esq. (via e-mail)
Dennis Khilkevich (via fax)